

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTRIC, D.T.E. 03-121

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Massachusetts Electric Company and Nantucket Electric Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to the Solar Energy Business Association of New England in this proceeding.

1. "MECo@ means Massachusetts Electric Company and Nantucket Electric Company, their officers, directors, employees, consultants, and attorneys.
2. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number(for example, DTE-MECo-1-1), the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
3. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
4. These requests shall be deemed continuing so as to require further supplemental responses if MECo or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
5. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche,

computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If MECo finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

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Information Requests

Information Requests Related to the Pre-filed Testimony of Carlos Gavilondo

- DTE-MECO-1-1 Refer to the Direct Testimony of Carlos A. Gavilondo at 11, lines 16-21.
Please explain how such a different level of standby service with a correspondingly lower charge could be incorporated into the standby rate tariffs proposed by NSTAR Electric.
- DTE-MECO-1-2 In reference to the testimony of Carlos A. Gavilondo at 14, lines 14-18, please provide a copy of all studies and publications used as the basis for the statement that: A . . the power crisis in California in 2002 . . . was exacerbated by large amounts of distributed generation shutting down due to a dramatic increase in the price of natural gas in that state. Similarly, the recent cold snap in New England January 14-16, 2004, saw many generators making economic decisions to shut down their units at a time when the system demand for electricity was high.@
- DTE-MECO-1-3 In reference to the testimony of Carlos A. Gavilondo at 14, lines 18-20, stating that: AFor distributed generation to provide real and reliable benefits on the distribution system, the operation of such generation must be subject to the control of the utility@, please:
(a) elaborate on the Areal and reliable@benefits referred to; and
(b) describe in detail all the requisite arrangements needed for the control of such generation by the utility.
- DTE-MECO-1-4 In reference to the testimony of Carlos A. Gavilondo at 15, lines 4-5, please provide a copy of any study, including network diagrams, that support the assertion that: AToday, there is no diversity of generation on a feeder-by-feeder basis because there is not enough customer-owned generation installed to date.@

D.T.E. 03-121

First Set of Department Information Requests to MECo

DTE-MECO-1-5 In reference to the testimony of Carlos A. Gavilondo at 13-14, please list and explain all the reasons why MECo has not initiated the process of consulting with the Rate Plan Settlement signatories on the development of a new back-up service rate and why MECo has not proposed such a rate.

Dated: March 26, 2004